

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

IN RE:

**KASHAUNA GOREE SIMON
DEBTOR(S)**

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§

**CASE NO. 18-60413
CHAPTER 13**

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes now JPMorgan Chase Bank, National Association (hereinafter referred to as "Chase"), a secured creditor in the above-entitled and numbered case, filing this its Objection to Confirmation of Chapter 13 Plan, and in support hereof represents:

1. The above-styled Debtor(s) filed a voluntary petition under Chapter 13 of Title 11, United States Bankruptcy Code, on July 1, 2018.
2. Debtor(s) is indebted to Chase pursuant to a promissory note secured by a recorded instrument granting a security interest in the real property with the address of 529 Dunmore Drive, Tyler, Texas 75703 (the "Property").
3. The Property is the Debtor(s)' principal residence.
4. The total amount due and owing to Chase at the time of filing was approximately \$300,833.01, with pre-petition arrearages of approximately \$62,535.37 (the "Claim").
5. Debtor(s) Chapter 13 Plan (the "Plan") as proposed provides only \$45,000.00 to satisfy the pre-petition arrearage portion of the Claim.
6. Chase objects to confirmation of the Plan because:
 - a. it does not comply with Section 1322(b)(2) and is not feasible because it understates the amount of the Claim, including, but not limited to pre-petition arrears and the total debt due and owing as of the date of filing.

WHEREFORE, PREMISES CONSIDERED, Chase prays that this Court deny confirmation of the Plan proposed by the Debtor(s), and grant Chase such other and further relief at law and in equity as is just.

Respectfully submitted,
Bonial & Associates, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following parties in interest either via pre-paid regular U.S. Mail or via electronic notification on or before the 23rd day of July 2018:

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